

Annette Hasapidis

From: Geller, Melissa S. <MSGeller@duanemorris.com>
Sent: Friday, September 6, 2024 10:23 AM
To: Amelia Schmidt; Jordan Merson; Danny Cevallos
Cc: Annette Hasapidis; Ackerman, David; kkramer@mersonlaw.com; Jennifer Plotkin; Breslin, Eric R.; Matt Kaiser; Courtney Forrest; david.cattie@cattie-law.com; venetia.velazquez@doj.vi.gov; Marvin, Cynthia
Subject: RE: Doe v. USVI et al. - Request for Reply Page Enlargement

Counsel,

We have a hearing before Judge Submaranian on September 27 at 1:00 p.m. Eric Breslin will be out of the state attending the American College of Trial lawyers meeting that week. We would like to ask consent to move the hearing to the following week. We would greatly appreciate the accommodation. Please let us know if there is an objection to asking for a date in the first week of October.

Regards,

Melissa S. Geller
Partner

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From: Amelia Schmidt <ASchmidt@kaiserlaw.com>
Sent: Friday, August 16, 2024 8:43 AM
To: Jordan Merson <jmerson@mersonlaw.com>; Danny Cevallos <danny@cevalloswong.com>
Cc: Annette Hasapidis <agh@hasapidislaw.com>; Geller, Melissa S. <MSGeller@duanemorris.com>; Ackerman, David <dackerman@motleyrice.com>; kkramer@mersonlaw.com; Jennifer Plotkin <jplotkin@mersonlaw.com>; Breslin, Eric R. <ERBreslin@duanemorris.com>; Matt Kaiser <mkaiser@kaiserlaw.com>; Courtney Forrest <cforrest@kaiserlaw.com>; david.cattie@cattie-law.com; venetia.velazquez@doj.vi.gov; Marvin, Cynthia <cmarvin@motleyrice.com>
Subject: RE: Doe v. USVI et al. - Request for Reply Page Enlargement

Good morning,

On behalf of Cecile de Jongh, I intend to make the same requests as Mr. de Jongh and Ms. Plaskett for (1) an extension of the deadline to August 26 and (2) an expansion of the 5-page limit to 10 pages. Am I correct in assuming that Plaintiffs also consent to the first request but not to the second?

Thanks,

Amelia

From: Jordan Merson <jmerson@mersonlaw.com>

Sent: Friday, August 16, 2024 7:54 AM

To: Danny Cevallos <danny@cevalloswong.com>

Cc: Annette Hasapidis <agh@hasapidislaw.com>; Geller, Melissa S. <MSGeller@duanemorris.com>; Ackerman, David <dackerman@motleyrice.com>; kkramer@mersonlaw.com; Jennifer Plotkin <jplotkin@mersonlaw.com>; Breslin, Eric R. <ERBreslin@duanemorris.com>; Matt Kaiser <mkaiser@kaiserlaw.com>; Amelia Schmidt <ASchmidt@kaiserlaw.com>; Courtney Forrest <cforrest@kaiserlaw.com>; david.cattie@cattie-law.com; venetia.velazquez@doj.vi.gov; Marvin, Cynthia <cmarvin@motleyrice.com>

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Our position to your request is the same as the others for the reasons set forth in our emails and letter. LMK if you have any questions. Thanks

Very truly yours,

Jordan K. Merson
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On Fri, Aug 16, 2024 at 3:49 AM Danny Cevallos <danny@cevalloswong.com> wrote:

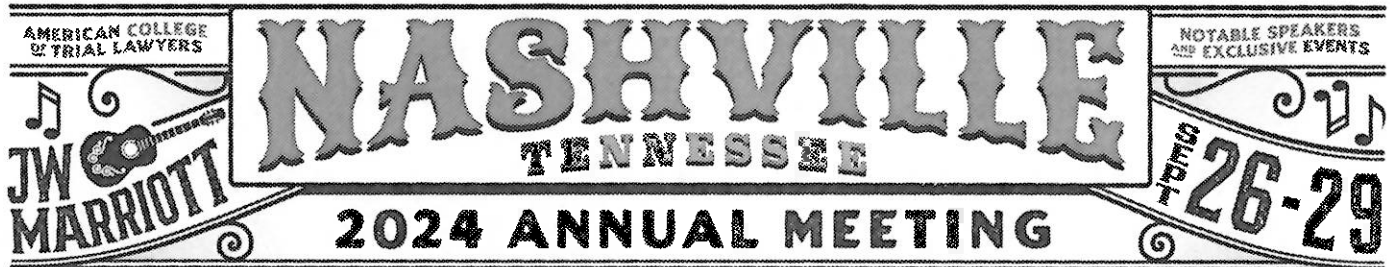
Good Morning: On behalf of deft Gov. John De Jongh, we make the same request as defendant Plaskett: (1) an extension of time to file our reply on the motions to dismiss from 8/21/2024 to 8/26/2024, and (2) an enlargement of the reply page limit from five pages to ten pages. May I say in our request that the plaintiffs consent to the time extension, but do *not* consent to the page extension? Thank you.

-Daniel Cevallos, Esq.



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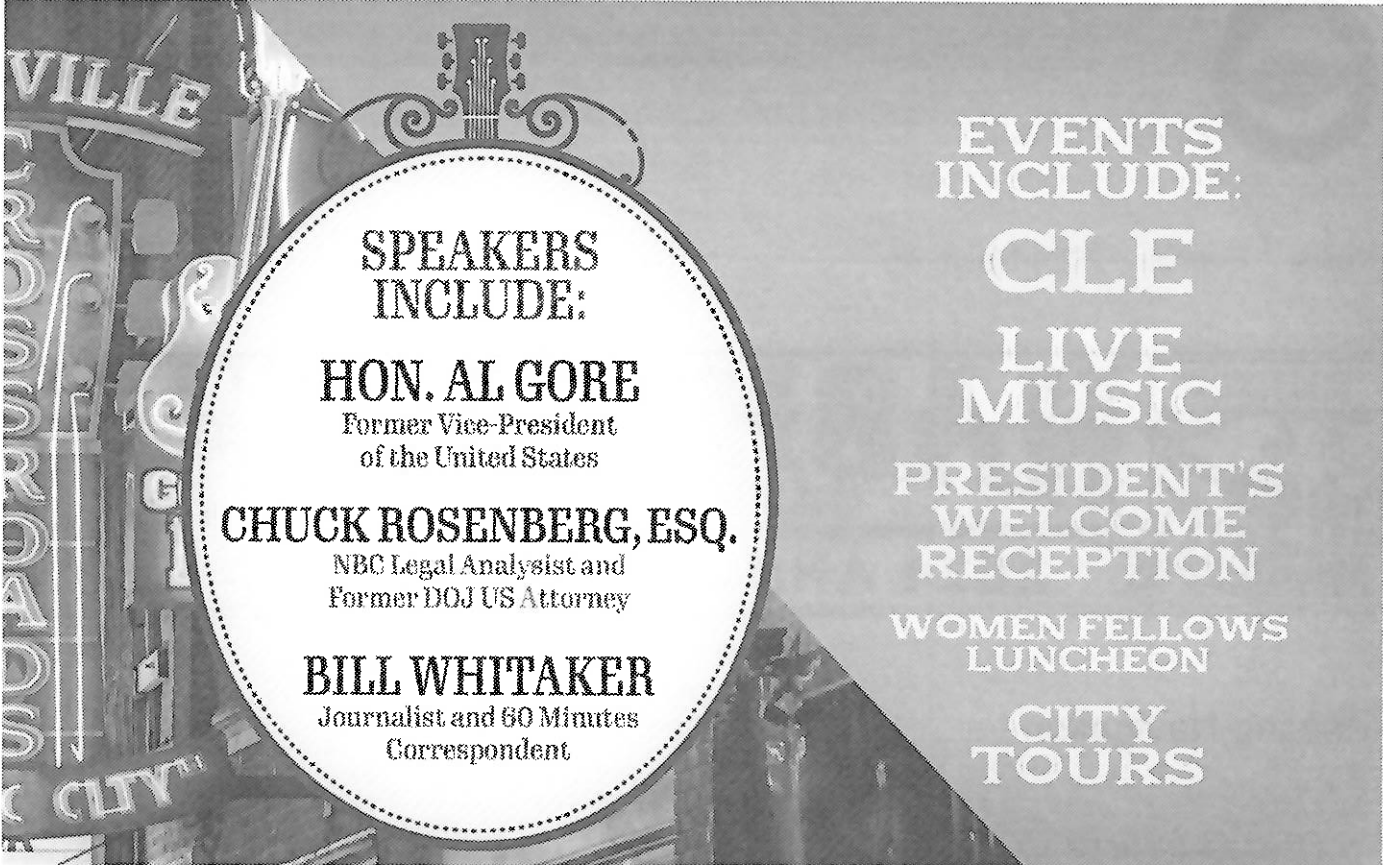


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Former DOJ US Attorney

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